



CQ76

August 21, 2002

NEPA Task Force
P.O. Box 221150
Salt Lake City, UT 84122

Re: Comments on the NEPA Task Force's Improvement and Modernization of NEPA Analysis and Documentation.

Dear NEPA Task Force:

STEVENS PASS

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The Stevens Pass Ski Resort submits the following comments concerning the NEPA process. Stevens Pass has been in operation since 1937, growing from a small rope tow facility to a modern, day-use resort serving nearly 500,000 guests during winter 2001-2002. While we hope to see improvement to the NEPA process over the next few years, several large projects dating from 1996 to the present have moved through NEPA reasonably well. Two major lift replacements have been done—one with considerable disturbance near a creek—requiring rock wall construction adjacent to riparian vegetation. Combined effort by the resort and the Forest Service resulted in meaningful mitigation designs that permitted the project to proceed. A culvert near a lift terminal was removed, replaced by a carefully designed creek bed, creating additional fish habitat. Three years later a large day lodge was constructed with a relatively short EA.

Much of the success of these projects came from the Forest Service genuinely understanding the need for the improvements, as well as their willingness to help develop significant, yet workable mitigation. All of this was done within the context of the Northwest Forest Plan, an additional challenge some areas of the country have not faced.

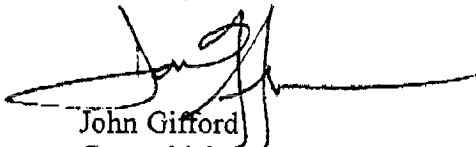
While we can list positive experiences with the NEPA process, there remain areas where simplification is needed, and where over-analysis should be avoided. For example, a 20-foot addition on the end of one of the day lodges was proposed, enclosing a concrete patio and removing a short section of vegetation adjacent to the building. Although the entire area had been previously disturbed and was within the base area, it was considered necessary to bring an ID team to the site, and perform a short biological review. Given the setting and scale of the project, we believe there should be a mechanism within NEPA to quickly exclude projects of this sort from analysis by specialists—to end the analysis at the level of the permit administrator—and complete the CE without additional study. We would agree that a broader range of analysis would sometimes be needed to complete a

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defensible CE, depending upon circumstances. What we are suggesting is language in the NEPA process that describes the kind of situations where the input of specialists and an ID team is not necessary.

On a larger scale, we believe NEPA should acknowledge the character of developed sites—whether ski resorts, campgrounds, or other capital-intensive activities—that will remain in a given locale for many decades. These are major land-use commitments that will remain for many decades, where maintenance and some change will continue indefinitely. In these cases—especially within a managed and frequently disturbed area, such as the already developed portion of a special use permit boundary—extra latitude should be provided in NEPA guidelines to minimize the need for CE or EA analysis. More thorough analysis would be needed only when projects propose disturbing significant areas of undeveloped land, or where the scale of a project could have an appreciable effect on the character of a resort.

Sincerely,



John Gifford
General Manager



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 Number of pages (including cover sheet): 3
☐ Urgent ☐ Confidential ☒ For your review

Date: 8-22-02

To: NEPA Task Force

From: Stevens Pass

Fax #: 801-517-1021

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Message:



Mountain Conditions:	
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